

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 20-CR-93

TYSHAUN SMITH,

Defendant.

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**JOINT REQUEST FOR ORDER OF  
PRE-PLEA PRESENTENCE INVESTIGATION**

Tyshaun Smith, by counsel, respectfully moves this Court for an Order of a pre-plea presentence report (PSR) in the above-captioned matter. Smith submits that a pre-plea PSR will be helpful in the interests of pursuing a resolution in this matter without a trial. In support of this request, and after discussing with undersigned counsel, Mr. Smith also consents to a pre-plea disclosure of the PSR to the Court, defense, and government. Undersigned counsel has discussed this matter with Assistant United States Attorney Philip Kovoov, who joins Smith in this request.

For these reasons, Smith respectfully requests that this Court order, forthwith, the production of a pre-plea PSR.

Federal Defender Services  
of Wisconsin, Inc.

Dated at Milwaukee, Wisconsin, this 11<sup>th</sup> day of February, 2021.

Respectfully submitted,

/s/ Gabriela A. Leija

Gabriela A. Leija, Bar No. 1088023

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